



from Susan Gladstone

California Regional Water Quality Control Board

San Francisco Bay Region

6/5/07 Bd Mtg ITEM 7
IRWM Rnd. 2 Guidelines
Deadline: 5/31/07 Noon



Arnold Schwarzenegger
Governor

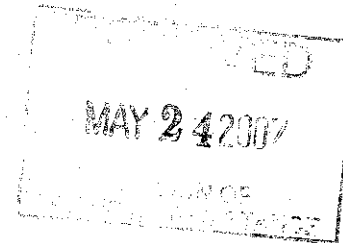
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Date: May 24, 2007

To: Tracie Billington
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Scott Couch,
State Water Resources Control Board
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From: Susan Gladstone, Grant Coordinator
San Francisco Bay Regional Water Quality Control Board
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Re: Draft Grant Program Guidelines: Prop 50, Chapter 8, Integrated Regional Water Management (IRWM); Proposal Solicitation Packages, Round 2, April 2007 (Draft Guidelines)

Dear Tracie and Scott:

Thank you for the opportunity to comment on the Draft Guidelines for Round 2 of the IRWM proposal solicitation. Region 2 Water Board staff offer these comments for your consideration.

1. Eligibility: We urge clarification in the Draft Guidelines to indicate that applicants with Integrated Coastal Watershed Management Plans/groups will receive equal consideration for funding as any other Plans/groups, as long as those Plans meet the IRWM Plan Standards.

We also believe 'regions' should continue to be self-defined, and that the IRWM Plans should be able to clearly define their regions with justifications for why the region chosen truly represents a realistic and integrated planning unit that includes integrated water supply, water quality, and watershed issues.

2. Large regions should be encouraged to adopt sub-regional planning groups as a part of the regional planning structure as a means to encouraging a scale of planning which is more accessible to a greater variety of local agencies and NGOs. The sub-regional groups can also better integrate geographically-based knowledge on project proposals.
3. IRWM Plan Minimum Standards: The Plan should demonstrate and document a clear connection between project priorities and clearly defined regional needs. The regional priorities should include regional performance measures (targets and milestones).

The priority setting processes should require a step in which project proposals are vetted through technical teams composed of resource and regulatory agencies and representatives of scientific and education organizations for their analysis and recommendations.

4. Stakeholder Involvement: We support the Standards, but request they go a step further by requiring documentation that demonstrates stakeholder input was integral to the development of the IRWM Plan. Stakeholders should have a defined role and higher scores should be given to those Plans that can demonstrate stakeholders were part of the decision-making process resulting in endorsement of the Plan.
5. Integration of Water Management Strategies: A component of a multiple-benefit project should be the ability of the project to provide a catalyst for additional projects that sustain the original intent of this program. For example, installation of stormwater cisterns in neighborhoods or commercial establishments to collect roof runoff for landscape irrigation during the dry weather period could benefit TMDL implementation (via air deposition load reduction); stormwater management (via temporary storage and reuse); sanitary sewer overflows (via reduced potential of I/I); potable water conservation (via reuse of stored stormwater); and, creek protection (via less erosive flows).

Another example is installation of green roofs on residential, commercial, or industrial facilities which would benefit energy conservation, climate change control, stormwater management, flood control, and air quality.

In turn, these types of projects could result in collaboration between public agencies that create additional incentives to support and enhance additional projects, such as: (1) energy suppliers offering a rebate for installation of green roofs; (2) an air quality management district reducing permit fees for green roof installation; or (3) POTWs or water supply agencies giving a rebate or reducing fees for facilities that install stormwater cisterns.

6. Applications and proposals should receive higher scores where municipalities have adopted smart growth, low impact development, transit-oriented development, green building standards, and the like. Applications and proposals that include retrofit or upgrade of existing infrastructures should receive higher scores where these modifications encourage infill and Brownfield redevelopments.

Please contact me at 510-622-2352 or sgladstone@waterboards.ca.gov if you have any questions about these comments.